

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

IN RE:

JAMES M OLSON  
xxx-xx-1279  
312 Flenniken St  
Gladewater, TX 75647-5676

§ § § § § § § § § § § §

CASE NO. 21-60198-JS-7  
CHAPTER 7

MARY H. OLSON  
xxx-xx-7765

DEBTORS

**MOTION OF TRUSTEE TO EMPLOY REAL ESTATE BROKER**  
**14-DAY NEGATIVE NOTICE – LBR 2004(a):**

**Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal bases for opposing the relief.**

No hearing will be conducted on this motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading **WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE** shown in the certificate of service unless the court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The court reserves the right to set a hearing on any matter.

**TO THE HONORABLE Joshua P. Searcy, U.S. BANKRUPTCY JUDGE:**

Diane S. Carter, Trustee (“Trustee”) files her Motion to Employ Real Estate Broker (“Motion”) as follows:

1. On May 6, 2021, James M Olson and Mary H. Olson (“Debtor”) filed with this Court a voluntary petition under Chapter 7 of the Bankruptcy Code. Diane S. Carter was thereafter appointed trustee of the estate, and is now the acting Chapter 7 Trustee.

2. The bankruptcy estate owns residential real property located at 3744 Highway 367 S Searcy, AR 72143-8746 (“the Property”).

3. In order to market the Property most effectively and thereby liquidate the Property for the best and highest price, Trustee has solicited the assistance of Beverly Baldrige, a licensed professional real estate agent, whose address is 200 W. Mulberry Ave, Searcy AR 72143. Ms. Baldrige will inspect and market the Property at her expense, to show the Property to interested parties, represent the Trustee as seller in connection with the sale of the Property, and advise the Trustee with respect to obtaining the highest and best offers available in the present market for the Property.

4. Based upon the foregoing agreement, Trustee desires to hire Beverly Baldrige as real estate agent to procure and submit to the Trustee offers to purchase the Property. In consideration for the services, Beverly Baldrige will receive a 6% commission of the gross sales price of the Property.

5. Beverly Baldrige has been informed and understands that no sale may be consummated until after notice and a hearing.

6. Trustee is satisfied that Beverly Baldrige is a disinterested person within the meaning of 11 U.S.C. §101(14).

7. Beverly Baldrige is aware of the provisions of 11 U.S.C. §328(a) and has agreed, notwithstanding the terms and conditions of employment set forth herein, that the Court may allow compensation different from the compensation provided herein if such terms and

conditions prove to have been improvident in light of developments unanticipated at the time of the fixing of such terms and conditions.

WHEREFORE, PREMISES CONSIDERED, Trustee requests that the Court enter an order authorizing her to employ Beverly Baldrige as real estate broker on the terms and conditions set forth herein.

Dated: July 19, 2021

Respectfully submitted,

BARRON & CARTER, L.L.P.  
660 N. Central Expressway, #101  
Plano, Texas 75074  
Tel: (972) 422-9377  
Fax: (972) 578-9707

By: /s/ Diane S. Carter  
Diane S Carter, Trustee  
TBA NO. 24043310

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2021, a true and correct copy of the above and forgoing shall be served via electronic means, if available, otherwise by regular, first class mail to below and the attached mailing matrix:

Centennial Bank  
c/o Cliff A. Wade, Baker Lopez  
5728 LBJ Freeway, Suite 150  
Dallas, TX 75240)

represented by

Cliff A Wade  
Baker Lopez  
5728 LBJ Freeway  
Ste 150  
Dallas, TX 75240

Mr. and Mrs. James M Olson  
312 Flenniken St  
Gladewater, TX 75647-5676

represented by

Carol Cross Stone  
Law Office of Carol Cross Stone  
1118 Judson Road  
Longview, TX 75601

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541

US Trustee  
Office of the U.S. Trustee  
110 N. College Ave.  
Suite 300  
Tyler, TX 75702

/s/ Diane S. Carter

Diane S. Carter

Label Matrix for local noticing

0540-6

Case 21-60198

Eastern District of Texas

Tyler

Mon Jul 26 16:03:43 CDT 2021

Bank of America

P.O. Box 15026

Wilmington, DE 19850-5026

CHI St. Vincent Infirmary

2 St. Vincent Circle

Little Rock, AR 72205-5499

Centennial Bank

c/o Cliff A. Wade, Baker Lopez

5728 LBJ Freeway, Suite 150

Dallas, TX 75240-6340

Chase Auto Finance

14800 Frye Road

Fort Worth, TX 76155-2732

Discover Financial

Attn: Bankruptcy

PO Box 3025

New Albany, OH 43054-3025

Mechanics Bank

Attn: Legal Dept

PO Box 5610

Hercules, CA 94547-5610

PRA Receivables Management, LLC

PO Box 41021

Norfolk, VA 23541-1021

Synovus Bank/GreenSky

Attn: Bankruptcy

PO Box 120

Columbus, GA 31902-0120

UT Health NE MD Anderson Cancer Center

UT Texas of Tyler

11937 US Hwy 271

Tyler, TX 75708-3154

AT&amp;T (S)

Attn: Bankruptcy Dept.

208 S Akard St Suite 3700

Dallas, TX 75202-4206

Bank of America NA

PO Box 31785

Tampa, FL 33631-3785

Diane Carter

660 North Central Expressway

Ste. 101

Plano, TX 75074-6759

(p)CENTENNIAL BANK ATTN SPECIAL ASSETS

P O BOX 1028

CABOT AR 72023-1028

Citibank, N.A.

5800 S Corporate Pl

Sioux Falls, SD 57108-5027

Ethan Noakes

214 Vincent St.

Bradford, AR 72020

James M Olson

312 Flenniken St

Gladewater, TX 75647-5676

Carol Cross Stone

Law Office of Carol Cross Stone

1118 Judson Road

Longview, TX 75601-5117

U.S. Attorney General

Department of Justice

Main Justice Building

10th &amp; Constitution Ave., NW

Washington, DC 20530-0001

Cliff A Wade

Baker Lopez

5728 LBJ Freeway

Ste 150

Dallas, TX 75240-6340

Alpha Recovery Corp.

6912 S. Quentin St. 10

Englewood, CO 80112-4531

Brand Source/Citi Bank

Attn: Bankruptcy

PO Box 6403

Sioux Falls, SD 57117-6403

Carti

POB 55050

Little Rock, AR 72215-5050

Centennial Bank

c/o Cliff A. Wade

Baker Lopez

5728 LBJ Freeway, Suite 150

Dallas, Texas 75240-6340

Discover Bank

Discover Products Inc

PO Box 3025

New Albany, OH 43054-3025

First Security Bank

Attn: Bankruptcy

PO Box 1009

Searcy, AR 72145-1009

Mary H. Olson

312 Flenniken St

Gladewater, TX 75647-5676

Synchrony Bank/Lowes

Attn: Bankruptcy

PO Box 965060

Orlando, FL 32896-5060

US Trustee

Office of the U.S. Trustee

110 N. College Ave.

Suite 300

Tyler, TX 75702-7231

White County

119 West Arch

Searcy, AR 72143-7723

Zwicker &amp; Associates, PC

80 Minuteman Rd

Andover, MA 01810-1008

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Centennial Bank  
1300 W. Beebe Capps  
Searcy, AR 72143

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Diane Carter  
660 North Central Expressway  
Ste. 101  
Plano, TX 75074-6759

(d)PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

End of Label Matrix	
Mailable recipients	30
Bypassed recipients	2
Total	32